

**Breslow v. Gleeson et al.**

**Case #: 2:21-cv-04703**

**Plaintiff's Objection to Sunrun's Motion to Dismiss**

The two main arguments that Sunrun makes in its motion to dismiss are that I was not an employee of Sunrun, but of Solar Energy World LLC, and that I did not exhaust EEOC remedies to the situation.

First, in my legal argument I never stated to be an employee of Sunrun. What I did assert which is factually accurate, is that Solar Energy World LLC is an authorized dealer of Sunrun's products, and we were all registered sales agents at Solar Energy World LLC of Sunrun. In Sunrun's own literature they set out codes of conduct and guidelines for their sales agents. As I stated Sunrun is a "Respondeat Superior" in this case, given that the doctrine establishes that a party is responsible for acts of their agents.

Second, Sunrun contends I did not exhaust EEOC remedies. I permitted and EEOC investigation and ultimately allowed in to run a sufficient course as to receive a "right to sue letter". I am entitled to resolve this matter in the courts and the EEOC investigated for some six months, and I felt that the pace was rather slow and that ultimately this was going to end up in court and upon legal advice brought it forward to legal proceedings.

None of Sunrun's arguments hold water and thereby do not warrant dismissing this case against them and I humbly ask the court to reject their motion to dismiss.

Respectfully submitted,

Jordan Tyler Breslow